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1	THOMAS E. FRANKOVICH (S.B.N. 074414)		
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6			
7	Attorney for Plaintiff IRMA RAMIREZ		
8			
9	ANALTED O	STATES DISTRICT COLUDE	
10	NORTHERN DISTRICT OF CALIFORNIA		
11			
12	    IRMA RAMIREZ,	) CASE NO.: 3:15-cv-01547-EMC	
13	Plaintiff,	STIPULATION OF DISMISSAL AND	
14	V.	[PROPOSED] ORDER THEREON	
15	YUCATASIA, et al.,		
16	Defendants.		
17	Defendants.		
18			
19			
20			
21			
22	The Parties, by and through their respective counsel, stipulate to dismissal of this		
23	action in its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(2).		
24	IT IS HEREBY STIPULATED by and between parties to this action through their		
25	designated counsel that the above-captioned action become and hereby is dismissed with		
26	prejudice and each side is to bear its own costs and attorneys' fees.		
27	//		
28	//		
	STIDLE ATION C	DE DISMISSAL AND IPDOPOSEDI OPDED	

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1	The parties further consent to and request that the Court retain jurisdiction over	
2	enforcement of the Agreement. See Kokonen v. Guardian Life Ins. Co., 511 U.S. 375 (1994)	
3	(empowering the district courts t	to retain jurisdiction over enforcement of settlement
4	agreements).	
5	This stipulation may be exec	uted in counterparts, all of which together shall
6	constitute one original document.	
7		Respectfully Submitted,
8	Dated: August 16, 2016	THOMAS E. FRANKOVICH, APLC
9		A PROFESSIONAL LAW CORPORATION
10		By: _/s/ Thomas E. Frankovich
11		Thomas E. Frankovich
12		Attorney for Plaintiff
13	Dated: August 16, 2016	LEPERA + ASSOCIATES, PC
14		
15		By: /s/ Joseph A. Lepera
16		Joseph A. Lepera Attorneys for Defendants
17		PHUONG DUONG dba YUCATASIA (erroneously sued as DUONG PHUONG)
18		sued as DOONG PHOONG)
19	Dated: August 16, 2016	LAW OFFICES OF JOSEPH A. SACRAMENTO
20		By: /s/ David John Foran
21		David J. Foran Attorneys for Defendants Lorraine T.C. Dun, Trustee
22		of the Lorraine T.C. Dun Survivor's Trust; and Trustee
23		of the Edmund Y.K. Dun Bypass Trust
24	//	
25	//	
26		
27		
28		

STIPULATION OF DISMISSAL AND [PROPOSED] ORDER

**ORDER** 

IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to Fed.R.Civ.P.41(a)(2) and each side is to bear its own costs and attorneys' fees. IT IS FURTHER ORDERED that the Court shall retain jurisdiction for the purpose of enforcing the parties' Settlement Agreement and General Release should such enforcement be

necessary.

Dated: \_\_\_\_\_\_, 2016

